

June 14, 2002

Commission's Secretary
Office of the Secretary
Federal Communications Commission
236 Mass. Ave. NE, Suite 110
Washington, DC 20002

Dear Commissioner:

I wish to provide comments on the FCC NPRM Case WC 02-60.

There are six main areas that I would like the Commission to address that would help the rural communities of Nebraska access and use telecommunications to deliver health services. It is my hope that you would implement these changes quickly in order for our rural health providers to have easier access.

The areas are:

1. Include Internet monthly service charges in this program. Video services in Nebraska are still too expensive for most providers, but Internet is now widely accepted. IP distribution of images is now a very accepted model.
2. Rural nursing homes, long term care facilities should be eligible entities for USF. Our state's population, especially in rural areas, is very old. Our fastest growth rate in our population is the 85+ grouping. Rural long-term care centers provide a large amount of care. Their providers need the telecommunications resources made possible by this program.
3. The Maximum Allowable Distance needs to be changed to allow HCPs to receive discounts for more of the telephone circuit. We would like you to expand the distance to anywhere in Nebraska or outside our state. This would simplify the calculations and enable more support for our applicants.
4. The application process needs to be streamlined. We have had some trouble with phone companies not filling out the Form 468 quickly. We believe you could completely eliminate the 468 form, which would save time.

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5. If no telephone competition exists in a rural area, eliminate the need to post the Form 465 for 28 days. There doesn't appear to be a real need to do this and it would speed up the application process.
6. We would like to remove the exclusion of for-profit entities from being eligible for the USF program in our rural-frontier areas. The reality is that we need everyone's participation in a telecommunication system if we are to sustain its use and/or advancement at the rural community level.

Thank you for your consideration of these proposed changes.

Sincerely,

Dennis Berens, Director
Nebraska Office of Rural Health
(402)471-0142

DB/all